

REMARKS

This application has been carefully reviewed in light of the Office Action dated April 6, 2006. Claims 1 to 45 are pending in the application. Claims 1 and 40, the independent claims, have been amended. Reconsideration and further examination are respectfully requested.

Claims 42 and 43 were rejected under 35 U.S.C. § 101 for allegedly claiming non-statutory subject matter. This rejection is respectfully traversed.

Specifically, the Office Action indicates that the rejection can be overcome by amending the claims to include a computer readable storage medium. However, Claims 42 and 43 as pending are already seen to include a computer readable storage medium, since Claim 42 recites computer-executable process steps "stored on a computer readable medium" and since Claim 43 recites "a computer-readable medium which stores" computer-executable process steps. Thus, these claims are seen to be directed to statutory subject matter. See *Lowry*, 32 F.3d 1579, 1583-84, 32 USPQ2d 1031, 1035 (Fed. Cir. 1994) (claim to data structure stored on a computer readable medium that increases computer efficiency held statutory) and *Warmerdam*, 33 F.3d 1354, 1360, 31 USPQ2d 1754, 1759 (Fed. Cir. 1994) (claim to computer having a specific data structure stored in memory held statutory).

Claims 1 to 3, 8, 10, 11, 13, 17, 22 to 32, 35 and 26 were rejected under 35 U.S.C. § 102(b) over U.S. Patent 6,125,390 (Touboul); Claims 4 to 7, 9, 12, 15, 16, 18 to 21, 37 and 41 to 45 were rejected under 35 U.S.C. § 103(a) over Touboul in view of U.S. Patent 5,696,701 (Burgess); Claims 33 and 34 were rejected under 35 U.S.C. § 103(a) over Touboul in view of U.S. Patent 6,167,567 (Chiles); Claims 38 and 39 were rejected under 35 U.S.C. § 103(a) over Touboul in view of Burgess and further in view of U.S. Patent

6,546,484 (Hirai); and Claim 14 was rejected under 35 U.S.C. § 103(a) over Touboul in view of Hirai. Reconsideration and withdrawal are respectfully requested.

The present invention generally concerns managing a plurality of multifunction network devices on a network, each multifunction network device having a network interface for communication on the network, and each multifunction network device further having a plurality of hardware resources including a storage memory for storing a plurality of function modules, a program memory for use by the function modules and a processor for executing each of the function modules. Among its many features, the present invention provides that (i) the function modules of a multifunction device include a function module for controlling a printer and a function module for controlling a scanner, and that (ii) in response to the detection of a reconfiguration event for one multifunction network device, a reconfiguration command for deleting at least one of the function modules is sent to the one multifunction network device.

Referring specifically to the claims, independent Claim 1 as amended is directed to a method for managing a plurality of multifunction network devices on a network, each multifunction network device having a network interface for communication on the network, and each multifunction network device further having a plurality of hardware resources including a storage memory for storing a plurality of function modules which include a function module for controlling a printer and a function module for controlling a scanner, a program memory for use by the function modules and a processor for executing each of the function modules. The method includes the steps of detecting a reconfiguration event for one of the plurality of multifunction network devices, and sending via the network a reconfiguration command to the one multifunction network device in response to the detection of the event, the reconfiguration command being a

deletion command to delete at least one of the function modules or a reallocation command to reallocate an amount of at least one of the hardware resources available for use by each of the plurality of function modules. The method also includes the step of receiving via the network a confirmation message confirming that the one multifunction network device has been reconfigured in accordance with the reconfiguration command, wherein the confirmation message is transmitted over the network by the one multifunction network device via its network interface.

Independent Claim 40 as amended is directed to a method for managing a plurality of multifunction network devices on a network, each multifunction network device having a network interface for communication on the network, and each multifunction network device further having a plurality of hardware resources including a storage memory for storing a plurality of function modules which include a function module for controlling a printer and a function module for controlling a scanner, a program memory for use by the function modules and a processor for executing each of the function modules. The method includes the steps of detecting a first reconfiguration event for one of the plurality of multifunction network devices, the first reconfiguration event being based on an increased need for usable capacity of the storage memory and of the program memory by a designated one of the plurality of function modules, sending via the network a first reconfiguration command, in response to detection of the first reconfiguration event, to the one multifunction network device, the first reconfiguration command comprised of a command to delete all of the function modules except for the designated function module from the storage memory and from the program memory of the one multifunction network device, and receiving via the network a confirmation message confirming that the one multifunction network device has been reconfigured by deleting all of the function modules

except the designated function module from the storage memory and from the program memory of the multifunction network device in response to first reconfiguration command. The method also includes the steps of detecting a second reconfiguration event for the one multifunction network device, the second reconfiguration event being based on a decreased need for usable capacity of the storage memory and of the program memory by a designated one of the plurality of function modules, wherein the second reconfiguration event is transmitted over the network by the one multifunction network device via its network interface and is received via the network, and sending via the network a second reconfiguration command, in response to the detected second reconfiguration event, to the one multifunction network device, the second reconfiguration command comprised of a command to download all of the function modules that were previously deleted in response to the first reconfiguration command, and to add the downloaded function modules to the storage memory and to the program memory of the one multifunction network device. In addition, the method includes the step of receiving via the network a confirmation message confirming that the one multifunction network device has been reconfigured by downloading and adding the previously deleted function modules to the storage memory and to the program memory of the multifunction network device in response to the second reconfiguration command, wherein the confirmation message is transmitted over the network by the one multifunction network device via its network interface.

The applied art is not seen to disclose or to suggest the features of the invention of the subject application. In particular, Touboul, Burgess, Chiles and Hirai are not seen to disclose or suggest at least the features that (i) function modules of a multifunction device include a function module for controlling a printer and a function module for controlling a scanner, and that (ii) in response to the detection of a

reconfiguration event for one multifunction network device, a reconfiguration command for deleting at least one of the function modules is sent to the one multifunction network device.

As understood by Applicants, Touboul discloses a system for monitoring and controlling at least one program capable of being executed on any one of at least two workstations in a network. See Touboul, Abstract. Furthermore, Figures 1 and 2 of Touboul are seen to depict a personal computer, possibly equipped with a printer.

The Office Action contended that Figures 1 and 2 of Touboul show a multifunction network device. Without conceding the correctness of this contention, Applicants respectfully submit that nothing in Touboul is seen to disclose or suggest multifunction devices with functional modules both for printing and for scanning. Rather, as noted above, Figures 1 and 2 of Touboul are merely seen to disclose that a personal computer may be equipped with a printer. Accordingly, Touboul is not seen to disclose or suggest that function modules of a multifunction device include a function module for controlling a printer and a function module for controlling a scanner.

Furthermore, Touboul is not seen to disclose or suggest that, in response to the detection of a reconfiguration event for one multifunction network device, a reconfiguration command for deleting at least one of the function modules is sent to the one multifunction network device.

In addition, Burgess, Chiles and Hirai have been reviewed and are not seen to compensate for the deficiencies of Touboul.


Accordingly, based on the foregoing amendments and remarks, independent Claims 1 and 40 as amended are believed to be allowable over the applied references.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicant's undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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